

## **PBS External Policy Guidance for Standalone Option for Furniture (and other Personal Property) Acquisitions (SOFA) by RWA**

PBS Reimbursable Services Program Office, Project Delivery Excellence Division, Office of Project Delivery, Office of Design & Construction.

### **1. Background and Current Status**

The implementation of standalone furniture and personal property acquisitions via a Reimbursable Work Authorization (RWA) is a service that has long been requested by our customers and allows us to better serve their space needs. FAS supports PBS in filling this niche by using the Schedules or Special Order Programs (SOP). The FAS SOP offers a myriad of vendor services including design, delivery, installation, etc.

Historically, past versions of the Reimbursable Services National Policy Document (RWA NPD) and the PBS Pricing Policy allowed RWAs for acquisition of personal property and furniture only if it was “incidental to” a buildout. Those documents did not allow PBS to assist client agencies with standalone purchases. However, as a matter of law, GSA Legal has advised that PBS may make furniture and other personal property purchases “not incidental” to a buildout, subject to the condition that the purchases must be made through a Federal Acquisition Service (FAS) program or contract, such as the SOP.

### **2. Decision and Requirements**

The current version of the RWA NPD allows PBS to use the Federal Buildings Fund to make standalone purchases of furniture for another client agency unrelated to a client agency relocation, space acquisition, or buildout. The RWA NPD links to this guidance for details related to standalone furniture acquisitions. Those details are:

- a. **A statement must be included in block 7, Description of Requirements in RWA Form 2957 stating that this RWA is a SOFA request.**
- b. The client agency may not add furniture or personal property to the RWA after the expiration of obligational authority on the RWA.
- c. A PM must be assigned to the standalone furniture or personal property project and will be responsible for the RWA project execution, funds management, milestone tracking, and close-out.
- d. Prior to PBS receiving or accepting an RWA for standalone furniture or personal property acquisition, the PBS Project Manager, Program Manager, or the Property Manager interacting with the client agency MUST coordinate the request with the Contracting Officer and the RWA Manager, to ensure that necessary resources are available to process the RWA. **This upfront communication is absolutely imperative!**

Note: Each region has the authority to deny acceptance of a standalone furniture request by RWA because of end-of-year or other resource constraints.

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- e. The authority for these standalone acquisitions is the Property Act (as amended) and NOT the Economy Act because the furniture/personal property acquisition must be for space that is under the jurisdiction, custody and control of GSA. (Please contact your RWA Manager or refer to the [RWA NPD](#) for further details.)
- f. These RWAs may not be used for severable services. PBS has arranged for a GSA pricing deviation to charge the 4% project management (PM) fee, along with the existing overhead fee, and the estimated costs for any additional in-house design services, for these standalone furniture acquisitions.
- g. PBS may provide assisted acquisition services via RWA for small, standalone purchases of furniture totaling more than \$25,000 but less than \$500,000 that are NOT incidental to a buildout or to a repair and alteration (R&A) project. Any request for services in excess of \$500,000 must go through FAS.
- h. Any RWA requesting assisted acquisition services for furniture or personal property that is incidental to a buildout or a repair and alteration (R&A) project, or is a standalone request that is determined to be outside the parameters of this SOFA Policy, must follow the traditional policy requirements for such acquisitions described in the RWA NPD.
- i. PBS must use an existing FAS Program or contract such as the SOP in all regions. This is also required for systems furniture. The standalone acquisitions by RWA will be limited primarily to design services that can be provided from the FAS Schedules. In-house design services will be limited to a cursory check (brief technical review) of the scope of work, cost estimate, etc. If more extensive in-house design services are necessary (i.e., creation of drawings and specifications depicting furniture layout for 10,000 square feet or less) an estimate for full recovery of these labor costs will be added to the RWA and billed to the client agency. Any requests for in-house design services that exceed 10,000 square feet must go through FAS.
- j. **Only furniture acquisition requests will be accepted at this time. Non-furniture or other personal property items are currently not allowed.**
- k. **This SOFA Policy does NOT apply to RWAs for Leases.**
- l. Mobile workplace solutions must be considered whenever appropriate.
- m. The list of standard services, and those at additional cost, are shown in **Attachment 1: FAS to PBS Menu of Assisted Acquisition Services**.
- n. If the client agency has a Blanket Purchase Agreement (BPA) in effect with FAS, then there must also be a delegation of authority in place for PBS to use the BPA. Otherwise, PBS should encourage the client agency to use its BPA with FAS directly and PBS should not process standalone furniture requests for that client agency.
- o. The RWA 4% project management fee and the appropriate sliding scale overhead fee for the standalone furniture or personal property, as well as any fees for in-house

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design services must be charged to the customer for this service. The PM and overhead fees are currently not charged for assisted acquisitions incidental to a buildout.

- p. An Independent Government Estimate (IGE) is required for all SOFA RWAs and the Summary Cost Estimate (SCE) worksheet for each RWA containing standalone furniture or personal property within the dollar cost threshold must be modified by the following instructions to users so that the appropriate fees will be included in Pegasys:
  - i. The estimated cost of the standalone furniture or personal property must be put on Line 7 (Miscellaneous) on the SCE worksheet.
  - ii. The standalone furniture/personal property submitted by RWA will be charged the 4% project management fee and the appropriate sliding scale fee.
  - iii. Any additional estimated costs for in-house design services as specified in item 3d, above should be entered on Line 23 (Other Labor Cost) in the SCE worksheet.
  - iv. The financial transactions involved in the standalone furniture/personal property accepted by RWA will be done by use of an IX document and a regional quarterly manual cost transfer of the appropriate RWA fees by the OCFO. Your respective budget analyst or RETA data entry user must submit the actual cost transfers quarterly to the PBS Financial Services Division (BGP) in Central Office for approval.

### **3. Cancellation or Expiration**

Unless modified or cancelled in writing by memo or changes to the RWA NPD, this guidance does not expire.

### **4. Questions?**

- i. PBS Project Delivery Excellence Division: Reimbursable Services Policy Lead, Lester Boggs at [lester.boggs@gsa.gov](mailto:lester.boggs@gsa.gov)
- ii. Federal Acquisition Service (FAS): Dan McAneney, Director, IWAC Business Development at [Daniel.mcaneney@gsa.gov](mailto:Daniel.mcaneney@gsa.gov)

We look forward to the opportunities and enhanced services this will provide to our client agencies. The guidance is available on our website at [www.gsa.gov/rwa](http://www.gsa.gov/rwa).

Thank you for your continued support of the Reimbursable Services Program.